

EXHIBIT I

TERRI YOLANDA LABLANCE,)
)
 Plaintiff,)
) **Case No: 4:19-cv-00693-BP**
 v.)
)
)
 CORIZON HEALTH, INC., et. al.)
)
)
 Defendants.)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Missouri Department of Corrections (“MDOC”), by and through its attorneys, responds to Plaintiff’s Second Set of Interrogatories as follows:

Defendant MDOC objects to the extent the instructions and definitions seek to place a burden on Defendant in excess of those recognized by the Federal Rules of Civil Procedure and the Western District Local Rules. Further, Defendant objects to the extent these definitions seek to define words contrary to their customary usage.

INTERROGATORY NO. 18: Identify the D.O.C. staff, who accessed Plaintiff's Department of Corrections records while Plaintiff was a nurse practitioner at the women's facility at Chillicothe. For each employee, identify their:

- a) title and race;
- b) whether they were reprimanded for accessing Plaintiff's records; and
- c) their reasoning for accessing Plaintiff's records.

ANSWER: Objection. This interrogatory is overbroad in scope and seeks information that may be protected from disclosure by the attorney-client privilege and/or work product doctrine. Subject to and without waiving the objections, see the list below:

**Brandon Doss COI
Nicholas Koenig COII
April Wolf COI
Dustin Lybarger COI
Bradley Richards COII
Jeff Parkey COI
Mindy Rhoades COI
Ashton Christopher Case Manager II
Philip Bower COII**

Each of the above individuals were reprimanded and counselled locally at the institution. Each individual's reasoning for accessing Plaintiff's records is unknown at this time, but counsel for Defendant will timely supplement as information arises.

INTERROGATORY NO. 19: Identify the D.O.C. staff member(s) who informed Corizon employees of LaBlance's D.O.C. records. For each employee, identify their:

- a) title and race;
- b) whether they were reprimanded related to Plaintiff's; and
- c) their reasoning for informing Corizon staff of Plaintiff's D.O.C. records.

ANSWER: Objection. This interrogatory is overbroad in time, vague and ambiguous as to the terms "D.O.C. records" and "informed." Additionally, it seeks information that may be protected from disclosure by the attorney-client privilege and/or work product doctrine. Subject to and without waiving the objection, unknown at this time. Counsel for Defendant DOC will timely supplement if information arises

Respectfully submitted,
ERIC SCHMITT
Attorney General

/s/ Rachel L. Jag

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Attorney for Defendant MDOC

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

TERRI YOLANDA LABLANCE,

Plaintiff,

v.

CORIZON HEALTH, INC., et. al.,

Defendants.

Case No: 4:19-cv-00693-BP

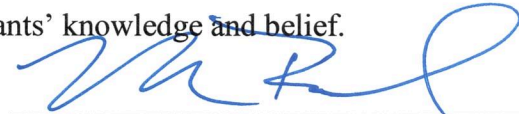
VERIFICATION

I, Matthew Briesacher, hereby state, under oath, that:

1. I am an officer or agent of Defendant Department of Corrections.

2. I have read Plaintiff's Interrogatories Nos. 18-19 and answered them by
furnishing such information as is available to Defendants; and,

3. I have read the answers to the interrogatories specified in the previous paragraph,
and such answers are true to the best of Defendants' knowledge and belief.



Signature of Officer or Agent of Defendant
(NOT TO BE SIGNED BY ATTORNEY)

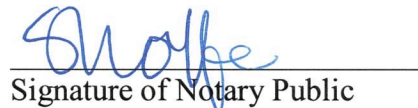
State of Missouri

County of Cole

Subscribed and sworn to before me this 28 day of October, 2020.

My commission expires:

4/27/2023



Signature of Notary Public

